

**REMARKS**

Applicant wishes to thank the Examiner for considering the present application. In the Office Action dated November 30, 2005, Claims 1-25 are pending in the application. Applicant respectfully requests the Examiner to reconsider the rejections.

Claims 1-20 and 23-25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Haviv* (2002/0059451) in view of Applicant's Admitted Prior Art (*AAPA*).

Applicant has reviewed both the *Haviv* reference and Applicant's Admitted Prior Art and respectfully traverses the rejections.

Claim 1 is a method for filtering content that includes receiving a packet containing a request for content at a content filtering router. The packet has a first destination Internet Protocol address of a content server that stores the content and the second destination IP address of the content filtering router. The method further includes determining whether the first destination IP address is on a list of destination IP addresses to be filtered and routing the packet to an output on the content filtering router based on the first destination IP address and the list. The Examiner points to paragraph 21 of the *Haviv* reference that describes a router and a filter. As described in line 6 of paragraph 21, the router may filter transactions and may route the filtered transactions to one of the server computers 14 or to another router 16 for additional filtering. With regard to this section, the Examiner states that "Haviv teaches content filter router 16 which receives packets which would include the address of the said router just before it receives the packet, and filters the packet before sending it to content servers 14." The *Haviv* reference is set forth for all the elements of Claim 1 except for presenting information on the list which the Examiner states is in the *AAPA*.

The Applicant disagrees with the Examiner on many levels. First, the Examiner fails to specifically state that the first element of Claim 1 is recited in the *Haviv* reference. Claim 1 specifically recites a packet containing a request for content is

received at a content filtering router. No such request for content is set forth in paragraph 21 of the *Haviv* reference. The second step of the claim is determining whether the destination IP address is on a list of destination IP addresses to be filtered. The Examiner cites the *AAPA* for this. However, although a list of restricted sites is mentioned in the *AAPA*, there is not determination of whether the destination IP address is on a list of destination IP addresses to be filtered. Further, neither of the references recite routing the packet to an output port on the content filtering router based on the first destination IP address and the list. Applicant therefore respectfully requests the Examiner to reconsider the rejection of Claim 1.

Independent Claim 14 recites receiving at an Internet Protocol communications device a packet containing a request for content where the packet comprises a source IP address of a client computer from where the request originated and a first destination IP address of a content server that stores the content. The method further includes determining that the request is to be subjected to a content filtering service based on the destination IP address and adding a second destination IP address of a content filtering router to the packet and sending the packet toward the content filtering router. Applicant respectfully submits that there is no teaching or suggestion in paragraph 21 of *Haviv* or in the *AAPA* for adding a second destination IP address of a content filtering router to a packet. *Haviv* merely teaches that routers may filter transactions but not of adding a second IP address to the packet. Applicant therefore respectfully requests the Examiner to reconsider the rejection of Claim 14 as well.

Claim 23 is another independent claim that is directed to a computer program. The claim is very similar to that of Claim 14 and therefore Applicant respectfully requests the Examiner to reconsider the rejection of Claim 23 for the same reasons set forth above.

Independent Claim 24 is directed to a system for content filtering comprising an Internet Protocol communications device coupled between at least one client computer and at least one filtering router. The IP communications device is configured to route requests for content received from the at least one client computer

toward the at least one filtering router and where the at least one filtering router is configured to route the request for content someplace other than a content server that stores the content when the content server's IP address is upon a list of addresses to be filtered. The list is a routing table stored on the content filtering router. As mentioned above, the *AAPA* mentions a list. However, the list is not a routing table stored on the content filtering router and neither of the references mentions that a filtering router is configured to route the request for content someplace other than a content server that stores the content when the content server's IP address is on a list of addresses to be filtered. Applicant therefore respectfully requests the Examiner to reconsider the rejection of Claim 24.

Claims 2-13, 15-20 and 25 are dependent claims and are believed to be allowable for the same reasons as their independent claims. Applicant therefore respectfully requests the Examiner to reconsider these claims as well.

Claims 21-22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Haviv* in view of *AAPA* in further view of *Hatanaka* (6,560,233). Applicant respectfully traverses.


Claim 21 is directed to a content filtering router. Claim 21 is similar to Claim 1 in that Claim 21 includes instructions for determining whether the first destination IP address is on a list of destination IP addresses to be filtered and instructions for routing the packet to one of the output ports based on the first IP destination address and the list. In this case, the routing table contains the list. As mentioned above with respect to Claim 1, these steps are not found in either the *Haviv* or *AAPA*. The *Hatanaka* reference also does not teach or suggest the elements missing from above. The *Hatanaka* reference is merely cited to teach a router and not the elements missing from the *Haviv* and the *AAPA*. Applicant therefore respectfully requests the Examiner to reconsider the rejection of Claim 21.

Claim 22 is directed to a bi-directional Internet Protocol communications device that has similar limitations to those of Claim 14 in that their instructions are for performing most of the steps of Claim 14. As mentioned above with respect to Claim 14,

the *Haviv* and the *AAPA* do not teach or suggest these elements. The *Hatanaka* reference is merely set forth for the basic teachings of input/output ports, a central processing unit, and communications circuitry. It is not alleged that the *Hatanaka* reference teaches or suggests the elements missing from the *Haviv* and *AAPA*. Applicant therefore respectfully requests the Examiner to reconsider the rejection of Claim 22 as well.

In light of the above remarks, Applicant submits that all rejections are now overcome. The application is now in condition for allowance and expeditious notice thereof is earnestly solicited. Should the Examiner have any questions or comments, which would place the application in better condition for allowance, he is respectfully requested to call the undersigned attorney.

Respectfully submitted,



Georgann S. Grunebach  
Reg. No. 33,179  
Attorney for Applicant(s)

Date: February 13, 2006

The DIRECTV Group, Inc.  
RE/R11/A109  
2240 East Imperial Highway  
P. O. Box 956  
El Segundo, CA 90245

Telephone: 310-964-4615